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Attorneys for Bank of Montreal

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

CHAPTER 11

CASE No. 08-13555 (JMP)

(Jointly Administered)

**WITHDRAWAL OF OBJECTION OF BANK OF MONTREAL TO CONFIRMATION OF THE THIRD
AMENDED JOINT CHAPTER 11 PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS
AFFILIATED DEBTORS**

PLEASE TAKE NOTICE that Bank of Montreal (“*BMO*”) by and through its counsel, Chapman and Cutler LLP, previously filed its Objection (the “*Objection*”) [Docket No. 21632] to both: (i) Confirmation of the Third Amended Joint Chapter 11 Plan (the “*Plan*”) of Lehman Brothers Holdings Inc. and its Affiliated Debtors (collectively, the “*Debtors*”) and (ii) the assumption of the Master Agreement (as defined therein). Pursuant to the Notice of (i) Adjournment of Hearing on the Debtors’ Proposed Assumption of Certain Executory Contracts and Unexpired Leases Pursuant to Third Amended Joint Chapter 11 Plan, and (ii) Date

for Debtors' Filing of Pleadings in Support of Confirmation of Third Amended Joint Chapter 11 Plan (the "*Notice*") [Docket No. 22346], the Debtors bifurcated the issues with respect to: (i) confirmation of the Debtors' Plan and (ii) the assumption of executory contracts and unexpired leases.

Pursuant to an agreement with the Debtors, BMO hereby withdraws its Objection with respect to the confirmation issues regarding the Debtors' Plan.

BMO has not resolved its outstanding issues with respect to the assumption of the Master Agreement (as defined in the Objection), and the Master Agreement is among the "Contested Contracts" as defined in the Notice. Pursuant to the Notice, the proposed assumption of the Master Agreement and the other Contested Contracts will not be considered by the Bankruptcy Court at the Confirmation Hearing. Instead, such issues are presently scheduled to be before the Court on February 14, 2012. BMO's Objection shall remain pending before the Court with respect to the assumption of the Master Agreement.

Therefore, BMO respectfully withdraws its Objection with respect to the confirmation issues regarding the Debtors' Plan, and BMO's Objection shall remain pending only with respect to the assumption of the Master Agreement.

Dated: November 28, 2011

Respectfully submitted,

BANK OF MONTREAL

By: /s/ Craig M. Price
One of Its Attorneys

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